



BILL RICHARDSON  
GOVERNOR

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**  
*Hazardous Waste Bureau*  
*2905 Rodeo Park Drive East, Building 1*  
*Santa Fe, New Mexico 87505-6303*  
*Telephone (505) 428-2500*  
*Fax (505) 428-2567*  
*www.nmenv.state.nm.us*



ENTERED



RON CURRY  
SECRETARY

DERRITH WATCHMAN-MOORE  
DEPUTY SECRETARY

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

June 9, 2004

R. Paul Detwiler, Acting Manager  
Carlsbad Field Office  
Department of Energy  
P.O. Box 3090  
Carlsbad, New Mexico 88221-3090

Dr. Steven Warren, President  
Washington TRU Solutions LLC  
P.O. Box 2078  
Carlsbad, New Mexico 88221-5608

**RE: NMED COMMENTS ON THE HANFORD SITE FINAL AUDIT REPORT, AUDIT A-04-06  
WASTE ISOLATION PILOT PLANT  
EPA I.D. NUMBER NM4890139088**

Dear Mr. Detwiler and Dr. Warren:

On January 8, 2004, the New Mexico Environment Department (NMED) received the Final Audit Report of the Hanford Site (**Hanford**) Audit Number A-04-06 (**Audit Report**), from the Department of Energy's Carlsbad Field Office (**CBFO**). CBFO and Washington TRU Solutions LLC (**the Permittees**) were required to submit this Audit Report under the Waste Isolation Pilot Plant (**WIPP**) Hazardous Waste Facility Permit as specified in Permit Condition II.C.2.c. The intended scope of this audit was to finalize the evaluation of the Hanford TRU waste characterization and certification activities related to the solids sampling and analysis program. This audit was a follow-up to the recertification audit A-03-14 performed June 16-20, 2003 to verify that the analysis of S3000 solids by the Idaho National Engineering and Environmental Laboratory, as well as project level validation and verification, were complete and in compliance with the requirements of the WIPP Permit. The Audit Report consisted of the following items:

- A narrative report
- Completed copies of relevant Permit Attachment B6 checklists
- Final Hanford standard operating procedures (hardcopy only)
- Objective evidence examined during the audit
  - General information
  - Solids and soils/gravel sampling
  - Acceptable knowledge

040614

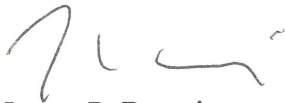


An NMED representative participated via teleconference in the Hanford audit held in at the CBFO offices in Carlsbad on November 4 – 5, 2003. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Conditions II.C.2 (Audit and Surveillance Program) and II.C.1 (Waste Analysis Plan [WAP]). The Audit Report indicates there was one recommendation identifying an opportunity for improvement offered for management consideration. Attached are NMED's general comments based upon observation of the Hanford audit and review of the Audit Report. These are provided to guide future audit report preparation and to assist the Permittees in understanding NMED's concerns.

NMED concludes that the Audit Report is incomplete in that it does not adequately address all elements examined during the audit. Because of this incompleteness, NMED is withholding Comments on the Permittees' Final Audit Report for Hanford Audit A-04-06 until the Permittees submit the additional information identified in the paragraph above and in the attached comments that demonstrate full implementation of all relevant permit requirements. Indicate revisions to any text in the Audit Report and checklists with redline/strikeout annotation.

If you have any questions regarding this matter, please contact me at (505) 428-2512.

Sincerely,



James P. Bearzi  
Chief  
Hazardous Waste Bureau

JPB:soz

Attachment

cc: Charles Lundstrom, NMED WWMD  
Steve Zappe, NMED HWB  
Tracy Hughes, NMED OGC  
Howard Roitman, CDPHE HMWMD  
Laurie King, EPA Region 6  
Betsy Forinash, EPA ORIA  
Connie Walker, Trinity Engineering  
Don Hancock, SRIC  
Joni Arends, CCNS  
File: Red WIPP '04

**NMED COMMENTS ON THE**  
**HANFORD SITE**  
**FINAL AUDIT REPORT A-04-06**

NMED's review indicated that the Audit Report showed less attention to detail in the B6 checklist than presented in previous Audit Reports and, unless remedied, this less rigorous approach to preparation could result in significant deficiencies in future Audit Reports. The body of the Audit Report appears to generally address the applicable elements. However, the following items on the B6 checklist need to be addressed prior to acceptance of this Audit Report:

1. Item 9 cites procedure WMP-400, Section 7.1.1, Paragraphs 4.2-4.3. The question does not appear to be answered.
2. Item 15 cites procedure WMP-400, Section 7.1.1, Paragraph 4.3.1. The question does not appear to be answered.
3. Item 22 cites procedure WMP-400, Attachment 1. Should Attachments 2 and/or 3 be cited instead?
4. Item 29 cites procedure WMP-400, Section 7.1.1. Although the question is addressed, there is no mention of repackaged waste.
5. Items 32 and 38 cite procedure FSP-PFP-5-8, Volume 2, Section 4.3.3 as TS review. The cited section does not refer to TS review.
6. Items 33 and 39 cite procedure FSP-PFP-5-8, Volume 2, Section 4.3.4, as QAO review. The cited section does not refer to QAO review.
7. Items 34 through 36 cite procedure ZO-162-082. The cited procedure was not included with the report.
8. Item 46 cites procedure ZO-160-082 Section 3.5.13. Shouldn't the cited section include all of 3.5?
9. Items 53 and 74 cite procedure WMP-400, Section 1.1, while question 53 also cites 4.0 Note 1,2. The cited procedure is included with the report but not Section 1.1.
10. Item 56 cites procedure WMP-400, Section 4.2. The cited procedure is included with the report but not Section 4.2.
11. Items 56a, 56b, 58, 60 and 61 cite procedure WMP-400, Section 4.3.2. The cited procedure is included with the report but not Section 4.3.2.
12. Item 62 cites procedure WMP-400, Section 3.1. The cited procedure is included with the report but not Section 3.1.
13. Item 79 cites procedure WMP-400, Section 7.1.6 but does not refer to a specific paragraph.
14. Item 81 cites procedure O-160-082. The cited procedure is not included with the report. Was procedure ZO-160-082 meant to be cited?
15. Items 84, 89-92, 95, 96, 99-102, 105, 106, 108-114, 118-122, 130 and 132 cite procedure ZO-062-082. The cited procedure is not included with the report.
16. Items 128 and 129 cite procedure FSP-PFP-5-8, Volume 2, Section 4.3.4. The cited procedure does not seem to answer question 128 and only partially answers 129.
17. Item 164 cites procedure WMP-400, Section 7.11. The cited procedure is included with the report but not Section 7.11.

